



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

February 12, 2020
FPU20-177

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Evaluation – *Final, Annual 2016 Groundwater Monitoring Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center [AFCEC/CIBW], Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated November 7, 2019.

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the documents and correspondence referenced above and below. ADEQ's purpose is to evaluate responses to ADEQ comments, and as appropriate, revised documents. ADEQ's evaluation follows the document list.

These documents and correspondence are associated by direct reference or inference:

- ADEQ Correspondence FPU18-246; dated May 31, 2018; sent to Ms. Catherine Jerrard, AFCEC/CIBW, Rome, NY; sent by Wayne Miller, ADEQ Project Manager.
RE: WAFB – ADEQ Comments - *Draft Annual 2016 Groundwater Monitoring Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated May 2, 2018.
- *Draft Annual 2016 Groundwater Monitoring Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec), Phoenix, AZ; document dated May 2, 2018.

ADEQ's evaluation follows.

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Evaluation

- (1) ADEQ acknowledges the majority of responses to the ADEQ May 31, 2018 comments (FPU18-246) are generally acceptable.
- (2) The recommendation appears reasonable. But a final decision is dependent upon concurrence from other stakeholders and would also depend upon future remedial actions occurring as planned and anticipated.
- (3) ADEQ notes that 16 months elapsed between the end of calendar year 2016 and ADEQ's receipt of the draft 2016 annual groundwater monitoring report (document dated May 2, 2018).
- (4) ADEQ notes that over 17 months elapsed between ADEQ's May 31, 2018 comment submittal and the November 7, 2019 response to ADEQ's comments.
- (5) ADEQ notes that elapsed time between actions and corrections will sustain deficiencies in subsequent actions and reporting.
- (6) ADEQ's evaluation noted that some additional clarification could benefit report users.

Additional Clarification Requests:

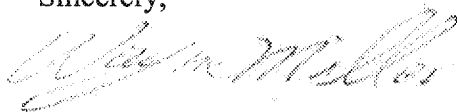
1. Refer to FPU18-246; Specific Comment 1 (Draft document page 2-1, section 2.1, lines 238-242). Please provide the requested temperature table. A temperature table was not provided in the November 7, 2019 text and the Appendix G *Response to Arizona ... Comments...*
2. Refer to FPU18-246; Specific Comment 7 (Appendix F). Please provide the edited graphs. The comment requested multiple edits to draft document graphs.
3. Report dated November 7, 2019; Section 4.0 *Summary and Recommendations*; page 4-5; Table 4-1 ST012 *Annual Groundwater Monitoring Activities – Years 2015/2016*.
 - (a) Format table to provide complete legibility. Some text appears truncated.
 - (b) Provide the "attached" report cited in the "Reference Cited" at the table page footnote.

Closure

ADEQ may add or amend comments, evaluations, and concurrence if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was delivered; if other parties bring valid concerns to our attention; or site conditions are deemed not protective of human health and the environment within the scope of this Department.

Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

cc:

Catherine Jerrard, USAF AFCEC/CIBW
Carolyn d'Almeida, U.S. EPA
William Hughes, CNSP
Steve Willis, UXO Pro, Inc.
ADEQ Reading and Project File

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